

Remarks/Arguments:

Please change the attorney docket number for this matter from "NAKI-BR22" to "42478-5500".

Claims 1-2, 4-8, 10-11, and 13-18 remain in this application. Claims 3, 9, and 19 have been canceled. Claims 1, 7, 12, and 18 were amended herein.

The Office Action stated that claim 19 would be allowable if rewritten in independent form. As claim 19 depended only on claim 18, claim 18 was amended to incorporate all the recitations of claim 19, essentially rewriting claim 19 in independent form and renumbering it as claim 18. As such, claim 18 is now in form for allowance.

Claims 1-18 were rejected as being unpatentable over *Saito* (EP 0989757) and/or *Saito* in view of *Foley et al.* (US 5510851, hereinafter *Foley*). The Applicant respectfully traverses because there is no teaching, suggestion, or motivation to combine the references, and the cited references do not, individually or in combination, teach, suggest, or motivate all of the recitations of any of the rejected claims.

The Office Action rejected claims 1-2, 7-8, 12-13, and 18 as being anticipated by *Saito*. This rejection is moot in light of the amendments provided herein. The Office Action acknowledged that claims 3-5, 9-10, and 14-16 are not anticipated by *Saito*, at least because *Saito* does not teach, suggest or motivate a gamma correction means for performing a gamma correction on the color signal. As the claims 1, 7, and 12 are amended herein to include the recitations of claims 3 or 9, and/or to recite performing a gamma correction on the color signal, and as claims 2, 8, and 13 are dependent on claims 1, 7, and 12, claims 1-2, 7-8, 12-13, and 18 are not anticipated by *Saito*.

In regard to claims 1 and 7 as amended herein, claims 1 and 7 each recite in part: "a chromaticity adjustment means for performing a gamma correction on signal values of the received color image signal, performing a calculation using the signal values on which the gamma correction was performed, and adjusting the chromaticity of an image to be displayed by the image display apparatus for each of primary colors red, green, and blue, separately." As such, they each claim an apparatus that performs gamma correction on signal values prior to adjusting chromaticity. In contrast, the cited references, individually and in combination, fail to teach, suggest, or motivate

performing gamma correction on signal values prior to adjusting chromaticity.

The Office Action admits that *Saito* does not teach, suggest, or motivate the use of gamma correction, but attempts to overcome the inadequacy of *Saito* by asserting that it would have been obvious to modify the *Saito* device to include the teaching of *Foley* to be able to rapidly calculate and apply smoothly varying correction signals in the digital domain on a pixel by pixel basis. However, *Saito* is directed to adjustments for each display of a multivision system, not to pixel by pixel adjustments. As such, the Office Action failed to provide an adequate reason for combining the references.

Even if it would have been obvious to combine the references, such a combination would not satisfy the recitations of the rejected claims. In particular, *Foley* teaches gamma correction after color correction, not prior to adjusting chromaticity as claimed (see Column 3, lines 51-52 stating "corrected color components are then gamma corrected" [emphasis added]). As such, the cited references do not teach, suggest, or motivate all the recitations of claims 1 and 7, and claims 1 and 7 are patentable over the cited references. Moreover, claims 2; and 4-6, 8, and 10-11 are patentable at least because of their dependence on either claim 1 or 7.

In regard to claim 5, it should be noted that the application of "inverse gamma correction on the color image signal output from the chromaticity adjustment means" is performed subsequent to an earlier gamma correction. As such, the cited references would have to teach, suggest, or motivate gamma correction both before and after chromaticity adjustment to render claim 5 unpatentable. As the cited references fail to do so, claim 5 is patentable over the cited references.

In regard to claim 12, claim 12 as amended herein recites in part: "the target chromaticity level for each primary color is set to a value in chromaticity coordinates that is among coordinate values belonging to a common chromaticity range which is common to ranges of chromaticity that can be displayed by the plurality of image display units, and is closest to a standard chromaticity coordinate value for each primary color." As such, the claimed apparatus determines a chromaticity level for each primary color to which the chromaticity values of a plurality of image display units are adjusted, enabling the plurality of image display units to have the same chromaticity value for each primary color. As such, the claimed apparatus limits

possible target chromaticity levels to levels displayable by all the display units ("common to ranges ... that can be displayed by the plurality of image display units...."). Moreover it also sets target chromaticity levels based on closeness to standard chromaticity values. In contrast, the cited references do not teach, suggest, or motivate either limiting target chromaticity levels in such a manner, or using standard chromaticity values in such a manner. Thus, the cited references do not, individually or in combination, teach, suggest, or motivate all the recitations of claim 12 or any claim dependent on claim 12.

It is believed that the case is now in condition for allowance, and an early notification of the same is requested. If the Examiner believes that a telephone interview will help further the prosecution of this case, he is respectfully requested to contact the undersigned attorney at the listed telephone number.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to the Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on July 21, 2004.

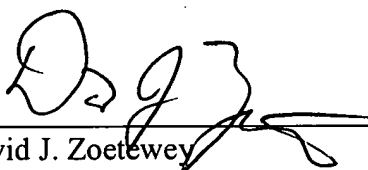
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Signature

Dated: July 21, 2004

Very truly yours,

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